

1 **GLUCK DANIEL ATKINSON LLP**
2 Craig C. Daniel (SBN 212588)
3 litigation@gluckdaniel.com
4 201 Mission Street, Suite 1330
5 San Francisco, CA 94105
6 Telephone: (415) 510-2509

7 **REID COLLINS & TSAI LLP**
8 Angela J. Somers (*admitted pro hac vice*)
9 asomers@reidcollins.com
10 Jeffrey E. Gross (*admitted pro hac vice*)
11 jgross@reidcollins.com
12 Minyao Wang (*admitted pro hac vice*)
13 mwang@reidcollins.com
14 420 Lexington Avenue, Suite 2731
15 New York, NY 10170
16 Telephone: (212) 344-5200
17 Facsimile: (212) 344-5299

18 *Special Counsel to Trustees of the Cred Inc.*
19 *Liquidation Trust*

20 **QUINN EMANUEL URQUHART SULLIVAN LLP**

21 Michael B. Carlinsky (*admitted pro hac vice*)
22 michaelcarlinsky@quinnmanuel.com
23 Renita N. Sharma (*admitted pro hac vice*)
24 renitasharma@quinnmanuel.com
25 51 Madison Ave., 22nd Floor
26 New York, NY 10010
27 Telephone: (212) 849-7000
28 Facsimile: (212) 849-7100

29 Terry L. Wit (SBN 233473)
30 terrywit@quinnmanuel.com
31 50 California Street, 22nd Floor
32 San Francisco, CA 94111
33 Telephone: (415) 875-6600
34 Facsimile: (415) 875-6700

35 Eric D. Winston (SBN 202407)
36 ericwinston@quinnmanuel.com
37 865 S. Figueroa St., 10th Floor
38 Los Angeles, California 90017
39 Telephone: (213) 443-3000
40 Facsimile: (213) 443-3100

41 *Attorneys for Defendants Lockton Insurance Company*
42 *LLC and Lockton Companies LLC – Pacific Series*

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45 **UNITED STATES DISTRICT COURT**
46 **NORTHERN DISTRICT OF CALIFORNIA**
47 **SAN FRANCISCO DIVISION**

48 CEDRIC DE LISSER, CHRISTOPHER MOSER,
49 and MICHAEL MICHELIN, in their capacity as
50 the Trustees of the Cred Liquidation Trust,

51 Plaintiffs,

52 v.

53 LOCKTON INSURANCE COMPANY LLC,
54 d/b/a LOCKTON INSURANCE BROKERS
55 LLC, a Missouri limited liability company;
56 LOCKTON COMPANIES, LLC – PACIFIC
57 SERIES, d/b/a LOCKTON INSURANCE
58 BROKERS LLC, a Missouri limited liability
59 company; and DOES 1-10, inclusive.

60 Defendants.

61 Case No. 3:23-cv-00243-JD

62 **[Removal from Superior Court of**
63 **California, County of San Francisco,**
64 **Case No. CGC-22-603638]**

65 **STIPULATION TO REQUEST THE**
66 **RESCHEDULING OF THE CASE**
67 **MANAGEMENT CONFERENCE**

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70 **State Action Filed: December 22, 2022**

1 Pursuant to Civil Local Rules 6-1(a) and 7-12, Plaintiffs Cedric De Lisser, Christopher
2 Moser, and Michael Michelin, in their capacity as the Trustees of the Cred Liquidation Trust
3 (collectively, “Plaintiffs”) and Defendants Lockton Insurance Company LLC, d/b/a Lockton
4 Insurance Brokers LLC and Lockton Companies, LLC – Pacific Series, d/b/a Lockton Insurance
5 Brokers LLC (together, “Defendants”), through their respective undersigned counsel, hereby
6 stipulate as follows:

7 WHEREAS, Plaintiffs commenced this litigation against Defendants in the Superior Court
8 of California, County of San Francisco;

9 WHEREAS, the Action was removed to this Court on January 18, 2023 by Defendants’
10 invocation of 28 U.S.C. §§ 1334(b), 1446, and 1452(a);

11 WHEREAS, Plaintiffs do not believe there is a basis for removal;

12 WHEREAS, Plaintiffs filed a *Motion to Remand or in the Alternative for Equitable Remand*
13 (the “Motion to Remand”) on February 17, 2023, Defendants filed their Opposition on March 3,
14 2023, and Plaintiffs filed a Reply on March 10, 2023;

15 WHEREAS, the Motion to Remand is scheduled for hearing before this Court on March 30,
16 2023;

17 WHEREAS, the Parties’ Initial Case Management Conference is scheduled before this
18 Court for April 13, 2023;

19 WHEREAS, the Parties agree that both sides will be able to more effectively meet and
20 confer regarding the Joint Case Management Statement and related issues once the Court has heard
21 the Motion to Remand;

22 THEREFORE the Parties respectfully jointly request that:

23 1. The Initial Case Management Conference scheduled for April 13, 2023 be rescheduled
24 to May 11, 2023 at 10:00 A.M. or on a date and time thereafter at the Court’s convenience.

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26 DATED: March 22, 2023

REID COLLINS & TSAI LLP

27 By: /s/ Angela J. Somers

28 Angela J. Somers (*admitted pro hac vice*)
asomer@reidcollins.com

1 Jeffrey E. Gross (*admitted pro hac vice*)
2 jgross@reidcollins.com
3 Minyao Wong (*admitted pro hac vice*)
4 mwang@reidcollins.com
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7 litigation@gluckdaniel.com
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8 201 Mission Street, Suite 1330
San Francisco, CA 94105
Telephone: (415) 510-2509

10 *Special Counsel to Trustees of the Cred Inc.*
11 *Liquidation Trust*

12 DATED: March 22, 2023

13 **QUINN, EMANUEL, URQUHART &**
SULLIVAN LLP

14 By: /s/ Terry L. Wit
15 Terry L. Wit (SBN 233473)
terrywit@quinnmanuel.com
16 50 California Street, 22nd Floor
San Francisco, CA 94111
17 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

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21 New York, NY 10010
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LLC and Lockton Companies LLC – Pacific Series, LLC

[PROPOSED] ORDER

PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO ORDERED.

SO ORDERED this ____ Day of _____, 2023.

UNITED STATES DISTRICT JUDGE
